

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

ROBERT T. MADISON,

Defendant.

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INDICTMENT

13 CRIM 633

The Grand Jury charges:

COUNT ONE
(Conspiracy to Commit Wire Fraud)

1. From in or about November 2004 through in or about June 2009, in the Southern District of New York and elsewhere, ROBERT T. MADISON, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that ROBERT T. MADISON, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings,

JUDGE ENGELMAYER

signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

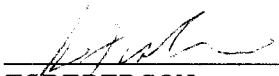
OVERT ACTS

3. In furtherance of the conspiracy and to effect its illegal object, ROBERT T. MADISON, the defendant, committed the following overt acts, among others, in the Southern District of New York and elsewhere:


a. On or about December 10, 2008, ROBERT T. MADISON caused a company he owned and controlled to fax a fraudulent invoice to a company based in Berkley Heights, New Jersey, fraudulently billing that company for \$187,420.

b. On or about December 29, 2008, ROBERT T. MADISON caused the Berkley Heights, New Jersey-based company to issue a check for \$187,420 from its bank located in Manhattan, New York to the company ROBERT T. MADISON owned and controlled.

(Title 18, United States Code, Section 1349.)



FOREPERSON



PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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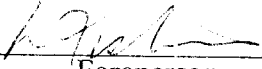
INDICTMENT

(26 U.S.C. § 1349)

PREET BHARARA

United States Attorney.

A TRUE BILL


Foreperson.

8-15-13
MB

Filed Indictment. Case
assigned to Judge Engelmayer
for all proceedings... Ellis, USAT